

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Lawrence Moyer

Case: 2:16-mj-30038
Judge: Unassigned,
Filed: 02-03-2016 At 11:28 AM
CMP: USA v MOYER (MAW)

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CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March-June, 2012 in the county of Oakland in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

Title 29, United States Code, Section 501(c)

Offense Description

Stealing Union Funds

This criminal complaint is based on these facts:

See attached affidavit.

Continued on the attached sheet.



Complainant's signature

Frank E. Schneider, DOL-OLMS Investigator
Printed name and title

Sworn to before me and signed in my presence.

Date: February 3, 2016

City and state: Detroit, Michigan

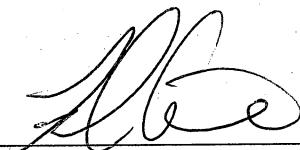

The Honorable Elizabeth Stafford
Printed name and title

I, Frank E. Schneider, declare the following under penalty of perjury:

1. I am an investigator for the United States Department of Labor, Office of Labor-Management Standards. I am assigned to the Detroit-Milwaukee District Office at 211 W. Fort Street, Suite 1313, Detroit, MI 48226. I have served with the United States Department of Labor, Office of Labor-Management Standards, since September 2013. This affidavit is submitted in support of a finding of probable cause and, therefore, is only a summary of the facts known to me.
2. Lawrence Moyer has been a member of the American Postal Workers Union (APWU) Local 6723 since 1979, when he gained employment with the United States Post Office. Moyer has served as president of the local since he was elected in July 1986. As president, Moyer is responsible for presiding over union meetings, training the stewards and trustees, and leading the organization.
3. Moyer assumed the role of treasurer after the former Treasurer retired. Moyer could not recall when the former treasurer retired, however, Moyer served as treasurer at all times relevant to this affidavit and up until February 2015. As treasurer, Moyer was responsible for maintaining all of the union's financial records and preparing the union's annual financial reports.
4. Based on several delinquent reports related to expenses for Local 6723, it was revealed that Moyer misused union funds, as detailed below, for his own personal gain.
5. On or about March 8 and 29, 2012, Moyer made unauthorized cash withdrawals from Local 6723's checking account totaling \$1,750 and used the proceeds for his personal benefit.
6. On or about May 11, 2012, Moyer wrote a check from Local 6723's checking account in the amount of \$700 made payable to cash. Moyer acknowledged that he used those Local 6723 funds for his personal benefit.
7. From on or about May 30, 2012, through on or about June 5, 2012, Moyer paid himself \$149.55 of union funds for expenses greater than he actually incurred. Specifically, Moyer attended the Michigan Postal Workers Union (MPWU) State convention, which was held from May 30, 2012, through June 2, 2012. Moyer withdrew \$500 from Local 6723's bank account on May 30, 2012, as an advance for his expenses for attending the 2012 MPWU

convention. Moyer used the advance to pay for a rental car and meals/incidental expenses totaling \$350.45. However, Moyer never repaid the local the \$149.55 he overpaid himself and used that amount for his personal benefit.

8. On July 14, 2015, your Affiant and Senior Investigator Grant Thomas interviewed Moyer at the post office where he worked in Troy, Michigan. During the interview, Moyer admitted to the above misconduct regarding union funds and signed a written statement acknowledging a violation of 29 U.S.C. § 501(c).
9. Based on the foregoing, there is probable cause to believe that Larry Moyer violated Title 29, United States Code, Section 501(c), by embezzling, stealing, and converting to his own use, the money of a labor organization of which he is an officer.



Frank E. Schneider, Investigator
U.S. Department of Labor
Office of Labor-Management Standards
211 W. Fort Street, Suite 1313
Detroit, MI 48226

Sworn to before me and subscribed in my presence this 3 day of February.

Elizabeth G. Stafford
Elizabeth Stafford
United States Magistrates Judge

Date

FEB 03 2016